IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

S
Case No. 4:21-CR-289-O

HOLLIS GREENLAW (01)

DEFENDANTS HOLLIS GREENLAW'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT

TO THE HONORABLE REED O'CONNOR

Pursuant to Local Criminal Rule 47.2(c), Defendant Hollis Greenlaw respectfully requests leave to exceed the 25-page limitation for his Motion for Judgment of Acquittal under Federal Rule of Criminal Procedure 29 ("Rule 29 Motion"). Mr. Greenlaw respectfully seeks 30 pages for his Rule 29 Motion. The government does not oppose this request.

Under this Court's Local Rules, parties may seek leave to exceed the 25-page limitation for "extraordinary and compelling reasons." *See* N.D. Tex. Crim. L.R. 47.2(c). Such reasons exist here.

Specifically, Mr. Greenlaw requires the additional five (5) pages for his Rule 29 Motion to fully address the grounds for a judgment of acquittal. The need for these additional pages is due to the extensive trial record and the complexities of the issues that arose from crimes charged in this case. The indictment charged Mr. Greenlaw in a ten-count indictment, including one count of conspiracy to commit wire fraud, one count of conspiracy to commit securities fraud, and eight counts of substantive securities fraud. Each of the charges covered a time frame of nearly five years and involved numerous complex financial transactions and accounting issues. Additionally, the evidence consists of testimony from 48 witnesses, including four expert

witnesses, and includes thousands of admitted exhibits. Thus, exceeding the normal 25-page limitation is necessary for Mr. Greenlaw to adequately address all of the legal and factual issues for the Court.

Mr. Greenlaw's counsel has consulted with the government, and they do not oppose this request.

For these reasons, Mr. Greenlaw respectfully requests that the Court grant him leave to exceed the page limit for his Rule 29 Motion by five (5) pages.

Dated: February 6, 2022

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CERTIFICATE OF CONFERENCE

I hereby certify that on February 6, 2022, I conferred with Assistant U.S. Attorney

Tiffany Eggers, counsel for the government in this case, regarding the motions described above.

Assistant U.S. Tiffany Eggers advised that the government does not oppose the requested relief.

/s/ Rose L. Romero
Rose L. Romero

CERTIFICATE OF SERVICE

I certify that on February 6, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that a true copy of the foregoing was furnished by CM/ECF to all counsel of record.

/s/ Rose L. Romero Rose L. Romero